

CHOATE LAW FIRM LLC

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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA AT JUNEAU**

MYRNA I. JOHNSON,)	
)	
Plaintiff,)	
)	
vs.)	
)	
FRED MEYER STORES, INC., and)	
JAIME SAN MIGUEL,)	
)	
Defendants.)	Case No. J-04-008 CV (JWS)

PLAINTIFF'S FINAL WITNESS LIST

Plaintiff submits her Final Witness List as follows:

1. Dennis Affleck
c/o Miller Nash

Mr. Affleck is a District Manager for Apparel for FMS in Alaska and supervised Mr. San Miguel and Ms. Johnson. It is expected that he has knowledge of the fact which form the basis for the Complaint as well as defendant's policies and procedures.

2. Paz Carillo
P.O. Box 33394
Juneau, AK 99803

Mr. Carillo was a part-time sales clerk in the apparel department where plaintiff worked and may have information with respect to her duties and responsibilities in the apparel department as well as knowledge regarding the incidents complained of herein, including but not limited to criticisms of the "recovery".

3. Rhonda Cox
9951 Steven Richards Drive
Juneau, AK 99801

Ms. Cox worked recovery with Myrna Johnson at the Fred Meyer store in Juneau and will testify regarding the quality of that recovery specifically and in general about the quality of Ms. Johnson's work, the supervision of Mr. San Miguel and the events leading up to Ms. Johnson's termination of employment.

4. Sara Dexter
P.O. Box 33004
Juneau, AK 99803

Ms. Dexter works in the apparel department and has been employed with Fred Meyer since 1995. It is anticipated she will have knowledge with respect to her duties and responsibilities in the apparel department as well as knowledge regarding the incidents complained of herein, including but not limited to her working relationships with plaintiff and defendant San Miguel.

5. Mary Drodody
4050 Delta Drive
Juneau, AK 99801

Ms. Drodody was employed by Fred Meyer in the apparel department and was supervised by Myrna Johnson. Ms. Drodody may have information with respect to her duties and responsibilities in the apparel department as well as knowledge of the incidents complained of herein, including but not limited to, upon learning of Myrna Johnson's termination, she wrote to Mary Lucas at Fred Meyer, Human Resources, expressing her outrage.

6. Jay Epstein
4436 Glacier Avenue
Juneau, AK 99801

Mr. Epstein was employed by Fred Meyer as a Loss Prevention Specialist from March, 1993 until January, 2003. Mr. Epstein has knowledge of the incidents complained of herein, including but not limited to the meeting between plaintiff, Fred Sayre and Jaime San Miguel, which reduced plaintiff to tears.

7. Charina Fontenot
4450 Julep Street
Juneau, AK 99801

Ms. Fontenot a Second Assistant at Fred Meyer and was trained by plaintiff. Ms. Fontenot may have information with respect to her duties and responsibilities in the apparel department as well as knowledge of the incidents complained of herein, including but not limited to, the baby furniture display which Jaime San Miguel ordered plaintiff to assemble.

8. Johnna Havard
3330 Nowell Avenue, #5
Juneau, AK 99801
(907) 388-0649

Ms. Havard is expected to testify consistent with her Affidavit and deposition testimony.

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1 9. James Hill
2 15016 Southeast Pine Grove Loop
3 Clackamas, Oregon 97015

4 Mr. Hill worked in the Human Resources Department and is anticipated to have
5 knowledge of the facts and circumstances of the subject matter due to his role as
6 Director of Operations.

7 10. Myrna Johnson
8 c/o Choate Law Firm LLC
9 424 N. Franklin Street
10 Juneau, AK 99801
11 (907) 586-4490

12 Mrs. Johnson is the plaintiff herein with knowledge of the facts and circumstances
13 which are the subject of her complaint and her resultant injuries and damages.

14 11. Russell Johnson
15 c/o Choate Law Firm LLC
16 424 N. Franklin Street
17 Juneau, AK 99801
18 (907) 586-4490

19 Mr. Johnson is the husband of Myrna Johnson. It is anticipated he may have knowledge
20 of the facts and circumstances which are the subject of plaintiff's complaint. It is
21 further anticipated he will have knowledge regarding the injuries and damages sustained
22 by Myrna Johnson.

23 12. Matthey Laney
24 821 9th Avenue #202
25 Seattle, WA 98104

26 Mr. Laney is expected to testify consistent with his Affidavit. Mr. Laney is a former
27 Fred Meyer apparel manager. Mr. Laney previously supervised both Myrna Johnson
28 and Jaime San Miguel. Mr. Laney has knowledge of the incidents complained of
herein, including but not limited to the work habits and actions of both plaintiff and
defendant while acting as their immediate supervisor.

13 13. Mary Lucas
14 15016 Southeast Pine Grove Loop
15 Clackamas, Oregon 97015

16 Ms. Lucas worked in the Human Resources Department and is anticipated to have
17 knowledge of the facts and circumstances the incidents complained of herein as well as
18 the EEOC investigation of the subject matter.

19 14. Jamie San Miguel
20 c/o Miller Nash

21 Mr. San Miguel is a defendant in the above entitled action with knowledge of the facts
22 and circumstances which are the subject of plaintiff's Complaint.

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15. Fred Sayre
Juneau, Alaska

Mr. Sayre is expected to testify consistent with his deposition testimony. If is further anticipated he will have knowledge of the facts and circumstances which are the subject of plaintiff's complaint.

16. Sally Tenwolde
28890 Lilac Road #147
Valley Center, California

Ms. Tenwolde worked in the apparel department and may testify in regards to the facts and circumstances leading up to Ms. Johnson's termination.

17. Maranda Willburn
5370 Commercial Blvd.
Juneau, AK 99801
(907) 780-6603

Ms. Willburn is expected to testify consistent with her Affidavit. It is further expected that Ms. Willburn has knowledge of the facts and circumstances which are the subject of plaintiff's complaint.

18. All Defendant's witnesses

19. Rebuttal witnesses as may be appropriate.

Respectfully submitted,
CHOATE LAW FIRM LLC

s/Mark Choate

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AK Bar: 8011070

Attorneys for Plaintiff

PROOF OF SERVICE

STATE OF ALASKA, FIRST JUDICIAL DISTRICT AT JUNEAU

I am employed in the City and Borough of Juneau, State of Alaska.. I am over the age of 18 and not a party to the within action. My business address is 424 N. Franklin Street, Juneau, AK 99801.

On May 30, 2006, I served the foregoing document described as PLAINTIFF'S FINAL WITNESS LIST, on the interested parties in this action by serving the original true copies, addressed as follows:

James Dickens
Miller Nash LLP
Attorney For: Fred Meyers
4400 Two Union Square
601 Union Street
Seattle, WA 98101-2352
Phone: (206) 622-8484
Fax: (206) 622-7485

Peter Gruenstein
Gruenstein & Hickey
Attorney For: Fred Meyers
500 L Street, Suite 401
Anchorage, AK 99501
Phone: (907) 258-4338
Fax: (907) 258-4350

☒ By mail, I deposited such envelope(s) in the mail at Juneau, Alaska, with postage thereon fully prepaid.

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. postal service on that same day with postage thereon fully prepaid at Juneau, Alaska, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.

☐ By personal service, I delivered such envelope(s) by hand to the ☐ office(s); ☐ the court box of the addressee(s)..

☐ By facsimile, I transmitted such documents from Juneau, Alaska, to the offices of the addressee(s).

☐ By email, I transmitted such documents from Juneau, Alaska, to the email address of the addressee(s).

☐ By electronic service through the court of record's electronic service system,.

☐ (State) I declare under penalty of perjury under the laws of the State of Alaska that the foregoing is true and correct.

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Johnson, Myrna v Fred Meyers [23003].
PLAINTIFF'S FINAL WITNESS LIST
J-04-008 CV (JWS)

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1 ☒ (Federal) I declare that I am employed in the office of a member of the Bar of
2 this Court, at whose direction the service was made.

3 Executed on May 30, 2006 at Juneau, Alaska..

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